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Clerk
District Court

AUG 18 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE**
12 **NORTHERN MARIANA ISLANDS**

13 **EQUAL EMPLOYMENT**
14 **OPPORTUNITY COMMISSION,**

15 **Plaintiff,**

16 **-vs-**

17 **MICRO PACIFIC**
18 **DEVELOPMENT, INC.,**

19 **Defendant.**

Civil Action No. 04-0028

DECLARATION OF KEIJI MORITA

20 I, Keiji Morita do hereby declare as follows:

21 1. I am the General Manager of Asia Pacific Hotels, Inc. d/b/a Saipan Grand Hotel. I make this
22 declaration based upon my personal knowledge and I am legally competent to testify as to the
23 matters set forth herein.

24 2. On December 3, 2004, a Purchase and Sale Agreement ("the Agreement") was entered into
25 by and between Asia Pacific Hotels, Inc. ("Purchaser") and Micro Pacific Development, Inc.
26 ("Seller") relating to the sale of the Saipan Grand Hotel. On January 8, 2005, Asia Pacific Hotels
27 Inc. took over the operation and ownership of the Grand Hotel.

28 3. Pursuant to the terms of the Agreement, the Purchaser and Seller agreed that existing Grand
Hotel management personnel would remain in place for a sixty day transition period beginning on

ORIGINAL

1 January 8, 2005.

2
3 4. Following this transition period, Asia Pacific Hotels, Inc. began replacing key
4 management personnel working at the Saipan Grand Hotel. These management changes include
5 without limitation the following:

6 (a) I replaced Mr. Setsuo Kawai as General Manager on or about January 27, 2005.

7 (b) Ed Cho replaced Assistant General Manager Masahiko Tsuchimoto on or about
8 January 8, 2005.

9 (c) Kazuto Matsumoto, Executive Chef, was replaced by Christopher Adams on or
10 about June 20, 2005.

11 (d) Food and Beverage Manager Hidekazu Katagishi was replaced by Anita Go on or
12 about July 1, 2005.

13 (e) Takahiro Tsuchiya was replaced as Rooms Division Manager on or about March
14 7, 2005.

15 (f) Jesus Aldan, Personnel Manager, was replaced on or about March 18, 2005. The
16 current Personnel Manager is Joe Ada.
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18

19 5. In addition to the foregoing changes in management personnel, Asia Pacific Hotels, Inc.
20 restructured management positions in the Saipan Grand Hotel and created new management
21 level positions.

22 6. Asia Pacific Hotels, Inc. owns the Dai-Ichi Hotel Saipan Beach and the Century Hotel in
23 Saipan. Pursuant to the terms of the Agreement, Asia Pacific Hotels acquired the assets of the
24 Saipan Grand Hotel.
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26 7. Asia Pacific Hotels, Inc. is diversifying its customer base. This diversification includes
27 the aggressive pursuit of Chinese tourists.
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1 I swear and declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct and that this declaration was executed on the 17 day of August,
3 2005, at Saipan, Commonwealth of the Northern Mariana Islands.

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7 **KEIJI MORITA**
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